

Message

From: Rossi, Debra [Rossi.Debra@epa.gov]
Sent: 8/6/2014 8:11:44 PM
To: Sutton, Douglas [dsutton@hgl.com]
CC: Susanna A. Mays [susanna@trustsc.com]; Michael P. Sherrier (michael.p.sherrier@dupont.com) [michael.p.sherrier@dupont.com]; Miller, Theresa [theresa_miller@golder.com]; Bower, Ryan [Bower.Ryan@epa.gov]; [Ex. 4 CBI]@cdmsmith.com; John Cargill [John.Cargill@state.de.us]
Subject: RE: DS&G follow-up items

Doug,

Thanks. EPA and CDM Smith are available to discuss the groundwater model at EPA's offices in the afternoon on August 18 or in the morning on August 19.

Debbie

Debra Rossi
Remedial Project Manager
DE, VA, WV Remedial Branch (3HS23)
EPA Region 3
1650 Arch Street
Philadelphia, PA 19103
(215) 814-3228
rossi.debra@epa.gov

From: Sutton, Douglas [mailto:dsutton@hgl.com]
Sent: Wednesday, August 06, 2014 3:50 PM
To: Rossi, Debra
Cc: Susanna A. Mays; Michael P. Sherrier (michael.p.sherrier@dupont.com); Miller, Theresa
Subject: RE: DS&G follow-up items

Debbie,

Tetra Tech, Inc. has been selected as the modeling contractor. [Ex. 4 CBI] from Tetra Tech will be the principal modeler. If you need further information or qualifications for [Ex. 4 CBI] we would be happy to provide you with that information.

Thank you,
Doug

From: Rossi, Debra [mailto:Rossi.Debra@epa.gov]
Sent: Wednesday, August 06, 2014 3:33 PM
To: Sutton, Douglas
Cc: Susanna A. Mays; Michael P. Sherrier (michael.p.sherrier@dupont.com); Miller, Theresa
Subject: RE: DS&G follow-up items

Doug,

Please provide EPA with the name and qualifications of the groundwater modeling contractor in accordance with section VI.A of the Consent Decree.

I will get back with you regarding availability for the modeling kickoff meeting and availability of an alternate EPA point of contact during my absence from the office next week.

Debbie

Debra Rossi

Remedial Project Manager

DE, VA, WV Remedial Branch (3HS23)

EPA Region 3

1650 Arch Street

Philadelphia, PA 19103

(215) 814-3228

rossi.debra@epa.gov

From: Sutton, Douglas [<mailto:dsutton@hgl.com>]

Sent: Wednesday, August 06, 2014 3:12 PM

To: Rossi, Debra

Cc: Susanna A. Mays; Michael P. Sherrier (michael.p.sherrier@dupont.com); Miller, Theresa

Subject: DS&G follow-up items

Debbie,

There are several items that I wanted to get to you before you leave on vacation in hopes that you can distribute as needed to your team. Here is a list of those items. Each one is discussed in more detail below.

1. Addressing low frequency detections in PRG calculations
 2. Classification of UPCUTZ
 3. Background sampling for PFCs
 4. Modeling kickoff meeting
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1. Addressing Low Frequency Detections in PRG Calculations (input from Linda Watson requested)

EPA Comment: Section 3.2, Selection of Chemicals of Potential Concern for Human Health Risk Assessment, Frequency of Detection: EPA no longer eliminates contaminants based on frequency of detection. All contaminants that fail screening must be included in the risk assessment. Once the risk is transparent, contaminants can then be eliminated based on background statistical analysis (using ProUCL software statistics).

Response and Request: In response to the comment provided above, we offer the following: The use of frequency of detection (less than 5%) for the selection of COPCs is consistent with the approach outlined in the USEPA Risk Assessment for Superfund (RAGs) Part A Guidance (USEPA, 1989), and has historically been considered standard practice in the preparation of a human health risk assessment. Since it is indicated that EPA no longer allows for elimination of COPCs based on the frequency of detection, please provide the appropriate written policy and/or guidance, so Golder can evaluate how the policy/guidance should be incorporated into the risk assessment.

In addition, ProUCL software is unable to calculate 95UCLs for analytes with a low frequency of detection; therefore, the maximum detected concentration would have to be used as the exposure point concentration (EPC) in place of a 95UCL. Using this method does not allow for elimination of COPCs based on background statistical analysis, as stated in the EPA comment above, but rather causes inclusion of statistically insignificant COPCs, results in the overestimation of exposure for a number of constituents, and does not reflect actual Site conditions. Please note that background concentrations in groundwater have not been evaluated for the Site; therefore, a statistical background analysis cannot be undertaken. Please clarify if those constituents with a low frequency of detection may be eliminated once the risk characterization has been undertaken.

2. Classification of the UPCUTZ.

Thank you for your email earlier. Golder was preparing a position on UPCUTZ classification on behalf of the Trust over the past several days. The position, which references the Delaware Geologic Society (DGS), is attached. Golder will continue its discussions with the DGS, and potentially USGS, if the matter needs further clarification.

3. PFC Sampling

The Trust will not be sampling PFCs in site monitoring wells or background monitoring wells. Golder has been reviewing wells that could potentially be used as background wells. When that work is completed, their findings will be forwarded to EPA.

4. Modeling meeting

In our June 12, 2014 meeting we had discussed starting the groundwater modeling effort with a kickoff meeting. The Trust has selected its groundwater modeling contractor, and we would like to discuss potential dates for a kickoff meeting with EPA. A preliminary look at our schedules suggests that sometime during the week of August 18th would work. We know that the following few weeks would not work. Can you look into availability for a modeling kickoff meeting during the week of August 18th, the week of September 15th, and the week of September 22nd?

If there is someone you would like us to work with or talk to in your absence to follow-up on any of these items, please let me know.

Thank you,

Doug

Doug Sutton, Ph.D., PE, LEED AP

Principal Engineer

HydroGeoLogic, Inc.

331 Newman Springs Road, Building 1

Fourth Floor, Suite 143

Red Bank, NJ 07701

Direct: 732-784-2812

Cell: 732-233-1161

Fax: 732-784-2850



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